

RIKER, DANZIG, SCHERER, HYLAND &
PERRETTI LLP

Joseph L. Schwartz (JS-5525)

Tara J. Schellhorn (TS-8155)

Headquarters Plaza, One Speedwell Avenue

Morristown, NJ 07962-1981

Telephone: (973) 583-0800

Facsimile: (973) 583-1984

Email: jschwartz@riker.com

tschellhorn@riker.com

PACHULSKI STANG ZIEHL & JONES LLP

Bradford J. Sandler (NJ Bar No. BS-1367)

Shirley S. Cho (admitted *pro hac vice*)

780 Third Avenue, 34th Floor

New York, NY 10017

Telephone: (212) 561-7700

Facsimile: (212) 561-7777

E-mail: bsandler@pszjlaw.com

scho@pszjlaw.com

Counsel to the Liquidating Trust

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:

FRANK THEATRES BAYONNE/SOUTH COVE,
LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 18-34808 (SLM)

(Jointly Administered)

**NOTICE OF LIQUIDATING TRUST'S MOTION FOR ENTRY
OF AN ORDER FURTHER EXTENDING THE PERIOD WITHIN WHICH THE
LIQUIDATING TRUSTEE MAY OBJECT TO GENERAL UNSECURED CLAIMS**

Advisory Trust Group, LLC, in its capacity as Trustee of the Frank Theatres Liquidating Trust (the "Liquidating Trustee") filed a motion for the entry of an order further extending the period within which the Liquidating Trustee may object to general unsecured claims (the "Motion").

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

¹ The Post-Confirmation Debtors in these chapter 11 cases and the last four digits of each Debtor's taxpayer identification number are as follows: Frank Theatres Bayonne/South Cove, LLC (3162); Frank All Star Theatres, LLC (0420); Frank Theatres Kingsport LLC (5083); Frank Theatres Montgomeryville, LLC (0692); Frank Theatres Rio, LLC (1591); Frank Theatres Towne, LLC (1528); Frank Theatres Mt. Airy, LLC (7429); Frank Theatres Sanford, LLC (7475); Frank Theatres Shallotte, LLC (7548); Revolutions at City Place LLC (6048); Revolutions of Saucon Valley LLC (1135); Frank Entertainment Rock Hill LLC (0753); Frank Entertainment PSL, LLC (7033); Frank Hospitality Saucon Valley LLC (8570); and Galleria Cinema, LLC (2529).

If you do not want the Bankruptcy Court (the “Court”) to issue an order granting the Motion, or if you want the Court to consider your views on the Motion, then, on or before January 5, 2021, you or your attorney must:

- File an objection, pursuant to D.N.J. LBR 9013-1(d), with the Clerk of the Court at:

United States Bankruptcy Court
50 Walnut Street
Newark, New Jersey 07102

If you mail your objection to the Court for filing, you must mail it early enough so the Court will receive it on or before the date stated above.

- Deliver a copy of your objection to counsel to the Committee at the following address: Riker, Danzig, Scherer, Hyland & Perretti LLP, Attn: Joseph L. Schwartz, Esq. and Tara J. Schellhorn, Esq., One Speedwell Avenue, Morristown, New Jersey 07962-1981 and Pachulski Stang Ziehl & Jones LLP, Attn: Bradford J. Sandler and Robert J. Feinstein, 780 Third Avenue, 34th Floor, New York, NY 10017; (b) counsel to the Debtors, Lowenstein Sandler LLP, One Lowenstein Drive, Roseland, New Jersey 07068, Attn.: Kenneth A. Rosen, Esq. and Joseph J. DiPasquale, Esq. and (c) to all parties requesting notice in this case, so as to be received on or before January 5, 2021.
- Attend the hearing scheduled to be held on **January 12, 2021 at 11:00 a.m.** before the Honorable Stacey L. Meisel, U.S.B.J., United States Bankruptcy Court, 50 Walnut Street, Newark, NJ 07102.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Motion and may enter an order granting that relief.

[Signature on next page]

Dated: December 22, 2020

/s/ Joseph L. Schwartz

RIKER, DANZIG, SCHERER, HYLAND & PERRETTI LLP

Joseph L. Schwartz (JS-5525)

Tara J. Schellhorn (TS-8155)

Headquarters Plaza, One Speedwell Avenue

Morristown, NJ 07962-1981

Telephone: (973) 583-0800

Facsimile: (973) 583-1984

Email: jschwartz@riker.com

tschellhorn@riker.com

-and-

PACHULSKI STANG ZIEHL & JONES LLP

Bradford J. Sandler (NJ Bar No. BS-1367)

Robert J. Feinstein (admitted *pro hac vice*)

780 Third Avenue, 34th Floor

New York, NY 10017

Telephone: (212) 561-7700

Facsimile: (212) 561-7777

E-mail: bsandler@pszjlaw.com

rfeinstein@pszjlaw.com

Counsel to the Liquidating Trust